

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA**

**ASHEVILLE DIVISION**

CARYN DEVINS STRICKLAND,        )  
                                      )  
                                      )  
                                      *Plaintiff*,        )  
                                      )  
                                      )  
v.                                        )    **Civil No. 1:20-cv-00066-WGY**  
                                      )  
                                      )  
UNITED STATES, *et al.*,        )  
                                      )  
                                      )  
                                      *Defendants*.        )

**PLAINTIFF'S MOTION FOR EXTENSION OF TIME TO RESPOND TO  
DEFENDANTS' REQUESTS FOR PRODUCTION**

Plaintiff Caryn Devins Strickland respectfully requests that this court extend the deadline to respond to Defendants' requests for production, which are currently due October 3, 2022, for 30 days, until November 2, 2022. Strickland has filed an emergency motion to stay the district court proceedings pending appeal. *See* ECF Nos. 148, 150. The Fourth Circuit has ordered an expedited briefing schedule on the emergency motion: Appellees filed their response on September 27, 2022, and Strickland intends to file an expedited reply. *See id.* Because it is unlikely that the Fourth Circuit will have an opportunity to rule on the motion before the discovery deadline on October 3, 2022, Strickland requests an extension. Moreover, this is Strickland's first extension request; Defendants previously received a 30-day extension to respond to Strickland's requests for production. *See* ECF No. 151.

An extension is thus warranted in the interests of fairness. Defendants consent to the requested extension.

This the 28th day of September, 2022.

Respectfully Submitted,

/s/ Jeannie Suk Gersen

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## CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of September, 2022, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Joshua M. Kolsky at [Joshua.Kolsky@usdoj.gov](mailto:Joshua.Kolsky@usdoj.gov)

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